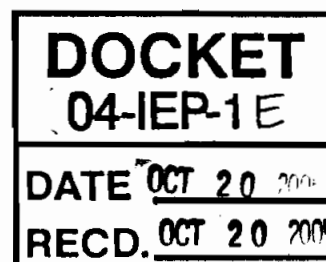


STATE OF CALIFORNIA  
ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION

In the Matter of:

2005 INTEGRATED ENERGY POLICY REPORT)

) Docket No. 04-IEP-1,  
)  
) RE: COMMITTEE DRAFT REPORT  
)  
)  
)  
)



WRITTEN COMMENTS RECOMMENDING  
AMENDING THE DEFINITION OF COMBINED HEAT AND POWER

The CHP Initiative Stakeholder

Thomas D. O'Connor  
O'Connor Consulting Services, Inc.

October 20, 2005

## **Combined Heat and Power**

On September 8, 2005 the Intermountain CHP Initiative representing numerous stakeholders filed a draft whitepaper (Draft) with the Western Governors' Clean and Diversified Energy Advisory Committee (CDEAC) recommending that the Western Governors Association adopt Combined Heat and Power (CHP) as one of the policies for its Clean and Diversified Energy Initiative. (see <http://www.westgov.org/wga/initiatives/cdeac/comments.htm>)

The Intermountain region CHP stakeholders appreciate the recognition the Draft IEPR provides on behalf of CHP and respectfully request that the CEC adopt the definition of CHP that was submitted to the WGA. Furthermore the Initiative requests that the IEPR' Table of Contents be amended to reflect this change.

### **RECOMMENDATION**

The Draft defines CHP as referring *"to any system that simultaneously or sequentially generates both electric energy and useful thermal energy, using the same unit of fuel."* (Executive Summary, page i)

The Initiative proposes the following recommendations

1. Amend the heading at the bottom of page 62 to read; **"Distributed Generation and Combined Heat and Power"** instead of **"Distributed Generation and Cogeneration"**.
2. Change the first sentence of the third paragraph on page 63 by deleting *"Cogeneration or combined heat and power "* and instead begin with **"Combined Heat and Power"**. Furthermore that sentence should be preceded by the definition of CHP as offered in the Draft (*see above*).

While the proposed recommendations would include cogeneration it also would allow for other applications. . If the WGA CDEAC does adopt the White paper the member states of the WGA will be working with the same definition of CHP and if the CEC adopts the same definition it would provide a cogent and consistent working definition among California, the Department of Energy, the US EPA and the other WGA member states.

The Intermountain Region CHP Initiative appreciates the opportunity to make these recommendations.

October 20, 2005